

# **EXHIBIT 6**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

LORI LYNN HEETHUIS,

Plaintiff,

Case No. 1:19-cv-00940

-vs-

HON: PAUL L. MALONEY

COUNTY OF MUSKEGON; and,  
RYAN BOIKE, Individually,

Defendants.

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**DEFENDANTS' SECOND REQUEST FOR PRODUCTION OF  
DOCUMENTS TO PLAINTIFF**

Defendants, County of Muskegon and Ryan Boike, through their attorneys,  
ROSATI SCHULTZ JOPPICH & AMTSBUECHLER, P.C., pursuant to Fed. R.  
Civ. P. 34, submits its Second Request for Production to Plaintiff:

1. Produce itemized cell phone bills/records for the phone number (231) 457-3661 from January 1, 2019 through May 15, 2019.

**Response:**

2. Produce the “file” about which Plaintiff testified at her deposition that she allegedly copied and which she believes to contain information placed in this file by Nate Stephenson.

**Response:**

ROSATI, SCHULTZ, JOPPICH  
& AMTSBUECHLER, P.C.

/s/ Melanie M. Hesano  
Laura S. Amtsbuechler (P36972)  
Melanie M. Hesano (P82519)  
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Dated: September 30, 2020

PROOF OF SERVICE

The undersigned certifies that the foregoing was served upon all parties to the above cause to each of the attorneys/parties of record herein at their respective addresses disclosed on the pleadings on 9/30/20.

BY: ☐ U.S. Mail ☐ Telefacsimile  
☐ Hand Delivered ☐ Overnight courier  
☐ Federal Express ☒ Other: E-mail

Signature: *Julie Doll*

I DECLARE UNDER THE PENALTY OF PERJURY THAT THE ABOVE AND FOREGOING ANSWERS ARE TRUE, COMPLETE AND CORRECT TO THE BEST OF MY INFORMATION, KNOWLEDGE AND BELIEF.

\_\_\_\_\_  
LORI HEETHUIS

Subscribed and sworn before me this \_\_\_\_\_  
day of \_\_\_\_\_, 2020

\_\_\_\_\_  
Notary Public  
My Commission Expires: \_\_\_\_\_